

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES

*

*

v.

*

Case No.: JKB 20-443

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LAFONTE JOHNSON

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*

CONSENT MOTION TO CONTINUE TRIAL

Comes now Gary E. Proctor, counsel for Mr. Johnson and moves on behalf of the Defendant to continue trial in this matter. In support thereof, counsel states as follows:

1. In ECF 229 this Court scheduled trial in this matter for August 22, 2022.
2. In that same Order this Court set various dates for the production of *Jencks*, motions *in limine*, proposed voir dire, jury instructions and verdict forms. Id.
3. Contemporaneously with this filing, the undersigned has entered his

appearance in this matter.¹ The undersigned is filing this from Costa Rica, where he is on a pre-planned vacation with his family. Counsel does not re-enter the country until August 5, 2022. Counsel has yet to review discovery.

4. As such, Defendant requests that trial in this matter be continued, as well as the other deadlines outlined above. Counsel has informed the United States that he does not oppose *Jencks* in this matter being withheld while this Motion is pending. Counsel has discussed the requested continuance with the Defendant, who has authorized him to state that he does not oppose the Speedy Trial Clock being tolled between now and the date for which the trial is re-scheduled.

5. Counsel prays that this Court remove the current trial date from its calendar, and hold a scheduling call the week of August 8, 2022 so that new deadlines can be set.

6. Counsel for the United States, Charles Austin, has authorized counsel to state that the Government does not oppose a continuance of either the trial date or the other matters referenced in ECF 229.

WHEREFORE Counsel request that the Court continue trial in this Matter and hold a telephonic scheduling conference on or after August 8, 2022.

¹ It is the undersigned's understanding that previous counsel, Mr. Purpura, will shortly be filing a motion to withdraw.

Respectfully Submitted,

_____/s/_____

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CERTIFICATE OF SERVICE

I hereby certify that on this day, July 27, 2022, a copy of the foregoing was served on all parties via ECF.

_____/s/_____

Gary E. Proctor